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1	Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999)	
2	WATT, TIEDER, HOFFAR & FITZGERALD, L. 2040 Main Street, Suite 300	L.P.
3	Irvine, CA 92614 Telephone: 949-852-6700	
4	Facsimile: 949-261-0771 Email: jkearl@watttieder.com	
5	cholley@watttieder.com	
6	Attorneys for Creditor Barnard Pipeline, Inc.	
7	IINITED STATES	BANKRUPTCY COURT
8		TRICT OF CALIFORNIA
9		CISCO DIVISION
10	In re:	Bankruptcy Case
11	PG&E CORPORATION,	Case No. 19-30088 (DM) Chapter 11
12	-and-	(Lead Case)
12		(Jointly Administered)
13	PACIFIC GAS AND ELECTRIC COMPANY,	
14	·	
15	Debtors. ☐ Affects PG&E Corporation	NOTICE OF CONTINUED PERFECTION
13	Affects FG&E Corporation	OF MECHANICS LIEN PURSUANT TO 11
16	☐ Affects Pacific Gas and Electric Company	U.S.C. § 546(b)(2)
17	□ Affects both Debtors	Solano County (Lien 201900004842)
18	* All papers shall be filed in the Lead Case, No. 19-30088 (DM)	
19		
20		
21	Barnard Pipeline, Inc. ("Barnard"), b	y and through its undersigned counsel, hereby gives
22	notice of continued perfection of its mechanic	cs lien under 11 U.S.C. § 546(b)(2), as follows:
23	Barnard has provided and deli	vered labor, services, equipment, and/or materials for
24	the construction and improvements of project	ts located in the County of Solano, State of California
25	(the "Property"), the legal description for wh	ich is set forth in the Claim of Mechanics Lien, a true
26	copy of which is attached hereto as Exhibit A	A (the "Mechanics Lien").
27	• • •	PG&E Corporation and/or Pacific Gas and Electric
28	Company (collectively, the "Debtors"), which	h filed voluntary petitions for relief under Chapter 11

of Title 11 of the United States Code (the "<u>Bankruptcy Code</u>") on January 29, 2019 (the "<u>Petition</u> <u>Date</u>").

- 3. On January 28, 2019, before the Petition Date, Barnard properly and timely recorded its Mechanics Lien under California Civil Code § 8400, *et seq.* in the Official Records of Solano County, State of California.
- 4. Through January 28, 2019, the amount owing to Barnard subject to its Mechanics Lien is at least \$488,987.07, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - 5. California Civil Code § 8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. See 11 U.S.C. § 362.
 - 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).

8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

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27 28 comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- The filing of this notice shall not be construed as an admission that such filing is 9. required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- The filing of this notice shall not be deemed to be a waiver of Barnard's right to 10. seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.
 - Barnard reserves all rights, including the right to amend or supplement this notice. 11.

Dated: April //___, 2019

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine, CA 92614

Email:

Telephone: 949-852-6700 Facsimile: 949-261-0771

ikearl@watttieder.com cholley@watttieder.com

Attorneys for Creditor Barnard Pipeline, Inc.

WATT, TIEDER,

ATTORNEYS AT LAW IRVINE

CERTIFICATE OF SERVICE

I hereby certify that on April 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as Exhibit B.

Jane G. Kearl

Watt, Tieder, Hoffar &

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28 WATT, Tieder,				
WATT, HEDER, HOFFAR & FITZGERALD, LCASE ATTORNEYS AT LAW IRVINE	: 19-30088	Doc# 1429	Filed: 04/15/19 19	NOTICE OF CONTINUED PERFECTION OF Entered: MECHANICS 3:1E9:84RS Paye 130df U.S.C. §

Recording requested by: Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614 Recorded in Official Records of Solano County

Marc C. Tonnesen

Assessor/Recorder

BERNARD PIPELINE INC

Dog # 201900004842



1/28/2019 10:36:00 AM AR16

Tilles: 1 Pages: 3
Fees \$37.00
Taxes \$0.00
Other \$75.00
Paid \$112.00

For recorder's use

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

Lien Notice Malled Per Govt. Cd. 27297.5

- 1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of Solano, State of California, and more particularly described as:
 - (1) Vaca-Dixon Substation, and all appurtenances and easements related thereto, including specifically, without limitation, all improvements, structures, and pipelines in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2; and
 - (2) All right, title and interest of Pacific Gas and Electric Company ("PG&E") at or near Lat. 38.403094 and Long. -121.916346, northeast of the PG&E Vaca-Dixon Substation, near the intersection of Interstate 80 and North Meridian Road, in all easements and all improvements, structures, and pipelines therein, in or on which Claimant provided labor, services, equipment and/or materials as set forth in paragraph 2.
- 2. After deducting all just credits and offsets, the sum of \$488,987.07, together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment and/or materials for installation of cathodic test stations on high pressure natural gas pipelines, and related construction work performed under the Alliance Agreement between Claimant and PG&E and Contract Work Authorization No. 2501594574, for UID#s 26814 26815 26811 26812 25945 25944 25943 25942 25950 25949 25952 25940 25941 25939 26096 26097 26099 26098 26091 26093 26094 26092 26807 26944 26808 26809 26943 26125 26137 26132 26139 26131, or as otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment and/or materials, at the request of: PG&E.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715,

Dated January 22 2019

BARNARD PIPELINE, INC.

Zach Bowler, Vice President

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January 22, 2019

Zack Bowler, Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

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PROOF OF SERVICE

I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served \square the originals \boxtimes true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

Julie Benton



WATT, TIEDER,
HOPFAR &
FITZGERALD, L.L.P.
ATTORNEYS AT LAW:
IRVING ASSETTION OF THE PROPERTY O

PROOF OF SERVICE

Doc# 1429

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619-342-9600			213-527-5342	214-981-9339	415-765-9501	310-229-1001		212-872-1002	949-315-3540		212-484-3990	213-629-7401	213-629-7401	935.8689	832-213-0157	415.703.5480		510-622-2270	213-897-2802		210.820.8859						615-744-5544	0 504-636-4000			410-361-8930			100	415-513-5985	302-442-7012		912-767-919	949-313-502	916-325-401
619-531-8700	661-665-5791	100,100	213-688-9500	214-720-4300	415-765-9500	310-229-1000		212-872-1000	949-748-1000		212-484-3900	213-629-7400	213-629-7400		212-836-8000 908-234-3318		415-510-3367	510-879-0815	213-269-6326	562-889-0182	1000	310-447-5875	415-542-8730	214-953-6500	415-291-6200		615-726-5544	504-566-5292; 504-566-5200	444-404-4555		302-252-4428	646-855-2464	214-521-3605		213-621-4000	0102,204,000	302-445-7010	415-659-7924	949-474-1880	916-325-4000
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Geoffrey E. Marr,	Britany 2, Lumines	Attn: Ron A. Symm		Attn: JOHN E. MITCHELL and YELENA 20		wtord	Attn: David P. Simonds	s,	Attn: Anne Andrews, Sean T. Higgins,			stein, Jordana L. Renert andy S. Kong and Christopher K.S.	Wong		Attn: Brian Lonan, Esq., Steveni Fruchter, Esq.	V. Grudus, Esq.			SARITA	PADILLA, and JAMES POLICE	ATTH: MARTHA E. ROMERO	Attn: Eric E. Sagerman, Lauren T. Attard	A tribat A tribat Carily & Dumas		Roberts, Kevin Chiu	Attn: Navi S. Dhillon	Attn: John H. Rowland	Attn: Lacey E. Rochester, Jan M.	Attn: Brian D. Huben	Attn: Craig Solomon Ganz, Michael 5.	Myers	Attn: Matthew G. Summers		Attn: Scott Summy, John Fiske	Attn: 1erry L. Hignam, 1.10mas c. McCurnin, Christopher D. Higashi	Attn: Matthew D. Metzger Attn: Kevin M. Capuzzi, Michael J.	Barrie	Arms Kriets M. Fons		Attn: Craig S. Simon
	ADLER LAW GROUP, APLC	Aera Energy LLC	AKERMAN IIP			Akin Gump Strauss Hauer & Feld LLP	Akin Gump Strauss Hauer & Feld LLP		Akin Gump Strauss Hauer & Feld LLP	ANDREWS & THORNTON		ARENT FOX LLP	Arent Fox LLP	ARENT FOX LLP	Choles It Person Know Scholes II P		Arronnes General of California			Attorney General of California	BALLEY AND ROMERO LAW FIRM	BAKER & HOSTETLER, LLP		BAKER & HOSTETLER, LLP	Baker Botts LL.P.	Baker Botts L.L.P.	Baker, Donelson, Bearman, Caldwell &	Baker, Donelson, Bearman, Caldwell &	Berkowltz, PC	Dellara Sperii Na	BALLARD SPAHR LLP	Ballard Spahr LLP	Bank of America	Baron & Budd, P.C.	Barton. Klugman & Oetting LLP	BELVEDERE LEGAL, PC	BENESCH, FRIEDLANDER, COFLAN & ANOROGI	BENESCH, FRIEDLANDER, COPLAN & ARONOFF	Recent Kahn a Law Corocration	Report Yahn a law Conoration
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counsel for one grant and some selection of the sound of		Attn: Michael W. Malter, Robert G.	2775 Park Avenue	S	Santa Clara CA	95050	20	408-295-1700	408-295-1531	Heinz@bindermalter.com
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Course for (predicts and Party-in-Interest Solloina)	Boutin Jones Inc.	Attn: Mark Gorton	555 Capital Mall	Suite 1500	Sacramento	1000				
asbestos personal injury	ELLUP	Attn: Alan R. Brayton, tsq. and bryn G. Letsch, Esg.	222 Rush Landing Road P	P.O. Box 6169 N	Novato CA	949	94948-6169	415-898-1555		bietsch@braytoniaw.com
	Bookers Coults 11 B	Artn: Mark V. Isola	2033 N. Main Street	Suite 720	Walnut Creek CA	94596	96	925-944-9700	925-944-9701	misola@brotherssmithlaw.com
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	Brunetti Rougeau LLP	Attn: Gregory A. Rougeau	אומוויפטוויפו א זיין בכל					0000 255 357	415-227-0770	vbantnerpeo@buchalter.com
T.	Anthre & Ornfordamy Connection	Christianson	SS Second Street	17th Floor	San Francisco CA		94105-3493	416.702.7015	_	arocles.aguilar@cpuc.ca.gov
Joursel for Oracle America, Inc.	California Public Utilities Commission	Attn: Arocles Aguilar	505 Van Ness Avenue		San Francisco CA	20105	700			melanlecruz@chevron.com
	CHEVRON PRODUCTS COMPANY, A DIVISION	Attn: Melanie Cruz, M. Armstrong	6001 Bollinger Canyon Road 12110		San Ramon CA	94583	583			marmstrong (# chevron.com
	Control of the state of the sta	atto: Kimberly S. Winick	800 Wilshire Boulevard	DOL	Los Angeles CA		21006	213-629-5700	213-624-9441	kwinick@clarktrev.com
- 4	משני פי זו בעותונים		and a	Suite 650	Ivine G		92614	949-260-3100	949-260-3190	mgoodin@clausen.com kchweitzer@czch.com
_	Clausen Miller P.C.	Attn: Usa Schweitzer, Margaret			New York NY		10006	212-255-2000	212-225-3999	mschierberl@cggsh.com
	Cleary Gottlieb Sheen & Hamilton LLP	Schlerbert		651 Boas Street, Room			*****	717-787-7627	1737-787-717	ra-II-ucts-bankrupt@state.pa.us
Counsel for Office of Unemployment Compensation	Commonwealth of Pennsylvania	Department of Labor and Industry	Collections Support Unit	702	Harrisburg					
ins vernices Course fine for some Construction Company Inc., Course Telephone Company, Kerman Telephone Co., Fanacies Telephone Co., The Ponderosa Telephone [4], Sierra Telephone Company, Inc.,			201 California Street, 17th Floor		San Francisco CA		94111	415-433-1900	415-433-5530	pcalifano@cwdaw.com deg@coreylaw.com
Volcano Telecian	Cooper, White & Cooper LLP		200 El Camino Seal	PO Box 669	Millbrae	5	94030-0669	650-871-5666	850-871-4144	air@coreylaw.com smb@coreylaw.com sm@coreylaw.com
Counsel for the Victim Creditors individual for the Capital Application of the California Superior Count in the North Bay Fire Cases, Judgia Council Coordination Proceeding	COREY, LUZAICH, DE GHETALDT & KIDULE LLY	Manzour Americant M Dire Alien F. Cardova.	San Fr	840 Malcolm Road,				000 000	720-690-650	fpltre@cpmlegal.com acordova@cpmlegal.com ablodgett@cpmlegal.com
Number 4954, Pursuant to the terms of the Court's	Cotchett. Pitre & Mocarthy, LLP	Abigail D. Blodgett		Suite 200	Burlingame	5	94010	0008-759-009		-
Them Ologi wo. T			County Administration	Drive Room 105A	Santa Rosa	8	95403	707-565-2421	200 555 655	
Attorney for County of Sonoma	County of Sonoma	Attn: Tambra Curtus	625 Court Street	Room 201			95695	530-666-8278	330-000-000	
ley Clean Energy Alliance	COUNTY OF YOLG	Attn: Mark D. Plevin, Brendan V.	Three Embarcadero Center,		San Francisco	5	94111	415-986-2800	415-986-2827	
Counsel to Renaissance Reinsurance LTD.	Crowell & Moring LLP	Mullan	1001 Pennsylvania Avenue,				20004	415-986-2827	202-628-5116	6 malmy@crowell.com
TWEXAM	Crowell & Moring LLP	Attn: Monique D. Almy	N.W.		Т	200	20004	202-624-2500	202-628-5116	tyoon@crowell.com
Coursel to Renaissance Reinsurance LTD.		Attn: Tacie H. Yoon	3 Embarcadero Center	26th Floor	San Francisco (94111	415-986-2800	202-924-293	mdanko@dankolaw.com
editors and Partles-in-loterest NEXAN I	1	Attn: Michael S. Danko, Kristine K.	333 Twin Dolphin Drive	Sulte 145	Redwood Shores	5	94065	650-453-3600	650-394-8672	kmeredith@dankolaw.com 2 smiller@dankolaw.com
Coursel for Fire Victim Creditors Coursel for Culbank N.A., as Administrative Agent for	DANKO MEREDITH	Attn: Andrew D. Yaphe	1600 El Comino Real		Menio Park	5	94025	650-752-2000	650-752-2111	
the Littin Acholying Credit Facility Counsel for the agent under the Debtors' proposed debtor in Pacsession financing facilities, Coursel for Cribank N. as Administrative Agent for the Utility	Davis Fork at Wattowell Lan	Attn: Eli J. Vonnegut, David Schiff,			New York	NX	10017	212-450 4331	212-701-5331	
Revolving Credit Facility	Davis Polk & Wardwell LLP	Timothy Graulich Artn: Karl Knieht	1339 Pearl Street	Suite 201			94558			Opt assignment of the second
Creditor and Counsel to Debra Grassgreen	pepra eressgreen	Atto: Broan F Bates, Fig.	303 Peachtree St., NE, Sulte 5300		Atlanta	SA	30308	404-527-4073	404-527-4198	-
Counsel to Bouthwire Company LLC Counsel Ca. Capital Power Corporation and Halkirk I	Dentors US LD	The same of the sa	601 S. Floueroa Street	Suite 2500	Los Angeles	5	90017-5704	213-623-9300	213-623-9924	14 John.moe@dentons.com
Wind Proceed LP Counsel for Capital Power Corporation and	Dentons US LLP	The state of the s	1221 Avenue of the		New York	λ	10020-1089	212-768-5347		Lauren.macksoud@dentons.com
Halkirk I Wind Project LP	Dentons US LLP	ALC: Lauren Macksoon	One Market Plaza Spear						416 767 4188	as michael isaacs@dentons.com

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